



Anti-Bribery Policy

It is Haydale's policy to conduct all business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery.

This policy applies to all individuals who are employed by the Company including Directors, Managers, employees (whether permanent, fixed term or temporary), consultants, contractors and any other person providing services to us.

What is a Bribe?

A bribe is a financial or other advantage offered or given:

- To anyone to persuade them to or reward them for performing their duties improperly, *or*
- To any employee with the intention of influencing them in the performance of their duties.

Gifts and Hospitality

This policy does not prohibit the giving and receiving of promotional gifts of a low value and normal and appropriate hospitality. Haydale will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence anyone in the performance of their duties.

Kickbacks

We do not make and will not accept "kickbacks" of any kind. Kickbacks are typically payments made in return for a business favour or advantage. All employees must avoid any activity that might lead to or suggest that a kickback payment will be made or accepted by us.

Donations

We do not make contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage.

Record Keeping

We will keep records and have appropriate internal controls in place, which will evidence the business reason for making any payments to third parties.

All expenses claims relating to hospitality, gifts, or expenses incurred to third parties must be submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

Registered Office: Clos Fferws, Parc Hendre, Capel Hendre, Ammanford, Carmarthenshire SA18 3BL

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All accounts, invoices, memoranda, other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off-book” to facilitate or conceal improper payments.

Raising Concerns

Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

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